

## REMARKS

The Office Action dated July 22, 2008 has been carefully considered. Individual issue raised in the Office Action will be addressed next. Reconsideration of the application is respectfully requested in view of the above claims amendments and following remarks.

### *Claim Rejections under 35 U.S.C. §112*

First, in response to the Examiner's allegation that there is no support for term "encoding" in the specification, pending claims were amended to recited term "coding".

Second, in response to the Examiner's allegation that there is no support for the limitation of "coding ... into a format different from the CAD drawing," applicants submit that it is immediately clear to the skilled man in the art on reading the specification that the data is not stored in the original CAD format-indeed if it were it would defeat the purpose of the invention.

It is inherent from the wording "coding a CAD drawing" itself that the result is not merely CAD code, using the Examiner's definition of coding as "putting in or into form or symbols of a code"; If a device was simply to leave the drawings in the CAD format then it would not have been "put into" symbols of code it would simply be kept in the CAD code it began in. (Yammamoto does not put a drawing in CAD format into symbols of code it merely maintains the drawings defined by the original bits of code.)

There are several examples of where this change of format are apparent; for example paragraph 17 of the specification teaches:

"[0017] The term "code bits" as used herein is intended to refer to any element of a code which is used in a coding system to represent an item or property value of an object which is being coded. Thus, a code bit may be a bit (binary digit) in a digital code as used, for example, in a preferred embodiment, or it may be some other element such as a numeric or alphabetic character, depending on the particular coding system employed".

It is apparent that many types of coding may be used rather than CAD format.

In paragraph 73, it is described that databases of CAD drawings require time and effort to search and that instead the "information about the drawing needs to be in a form which facilitates a quick and efficient comparison". Accordingly it is clear that the result of the coding should not be the same as the original CAD drawings (since this has been found to be difficult to search) but in a new form (which is easy to search).

Paragraph 78 describes how the coding of the entities may vary

"[a]t step 104 a determination is made of a code structure which is to be used to assign code bits to the properties of each entity. The code structure may be different for different classes of drawing. For example one class of drawing may be electrical circuit diagrams, which would have a different code structure to, say, engineering component drawings. The code structure may be different for different types of property (e.g. different code structures for line lengths and radii of circles)."

Again, the coding structure is taught to be variable and therefore not to the original CAD format.

It is clear from paragraph 83 that the data is stored as types and vectors: ("At step 160 a type is identified for each entity from a predefined plurality of entity types. Each type has associated vector data items") which is different from 2D CAD modeling, which is vector based.

### **Claim Rejections under 35 U.S.C. §103**

In the Office Action, claims 1-3, 7, 17-26, 36-39, 49-52 and 54 were rejected under Section 103(a) as being unpatentable over Yamamoto (US-PGPUB 2001/0043236) in view of Agnes et al. (US6,918,095) and Beatty et al. (US-PGPUB 2004/0049307), and other references.

Applicants respectfully traverse.

With regard to the Yamamoto and Agnes references, applicants submit the pending claims are patentable over these references at least for the reasons set forth in applicants' Responses dated May 9, 2008 and August 27, 2007 in the present application.

With respect to the newly cited Beatty references, applicants submit that Beatty appears to have little or no relevance to the invention and does not contain features described by the Examiner. In particular, "generating code bits representative of the extracted properties" are not disclosed in Beatty. The Examiner refers to paragraph 41 lines 1 to 3 which states :

"A programmer 'programs' in an object-oriented programming language by writing individual blocks of code each of which creates an object by defining its methods."

This relate to program code that refers to instructions executed by the CPU of a computer - it has nothing to do with 'representing' the extracted vector properties - it simply describes the normal characteristics of this approach to programming. The 'modeling' referred to here has no relationship with CAD models but relates to the representation of the 'use cases' that represent the activities and interactions between a human user and a computer program.

Beatty does not disclose that code bits "are representative of the extracted properties".

The Examiner refers to paragraph 50 line 25- 32 which states :

"For this reason, the use of vector drawings facilitates the transmission of graphic information over the internet. In one form of the present invention, the modifiable graphical component of the process design data is a vector image created using a CAD program. The use of a CAD program to create vector images enables process engineers to edit the modifiable graphical component of the design data whenever A is deemed necessary to do so."

This is simply a description of the creating of a normal CAD drawing and the benefits that a CAD drawing has over a raster image in economy of transmission. It has no relationship to extraction of vector properties from an existing CAD drawing.

Further the Examiner states that :

"... internet involves the compression of the data, which obviously involves the generating of code bits representative of vector properties, and the adding of the code bit to a view code for the view, which is well known for one having ordinary skill in the art..."

Compression of drawings data does not involve generating new code bits representative of vector properties.

Furthermore, Beatty does not disclose "storing the view code" at paragraph [0074], line 9-70, as stated by the Examiner. Para 0014 does not refer to the storing of a view code it just says the data is stored.

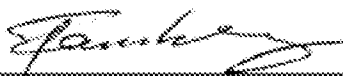
Additionally, we note that the Examiner suggest that extracting properties derived from coordinate is obvious because all entries have coordinates. However, just because an entity has coordinates does not mean it is obvious to extract properties derived form those coordinates.

### Conclusion

In view of the above, the Applicants respectfully submit that the present application is in condition for allowance and a favorable disposition to that effect is respectfully requested. Should the Examiner have any questions regarding the above amendments, he is kindly invited to contact the Applicants' undersigned representative at the indicated number.

Respectfully submitted,

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